

UNITED STATES DISTRICT COURT **20cr35 MJD | KMM**
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

v.

ALONZO CARTER,
a/k/a "Alonzo Richardson,"

Defendant.

18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)
18 U.S.C. § 924(d)
18 U.S.C. § 924(d)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 853(a)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

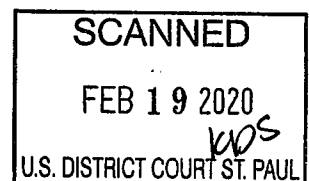
COUNT 1

(Possession With the Intent To Distribute Heroin and Cocaine)

On or about August 29, 2019, in the State and District of Minnesota, the
defendant,

ALONZO CARTER,
a/k/a "Alonzo Richardson,"

did knowingly and intentionally possess with the intent to distribute a mixture
and substance containing a detectable amount of cocaine and 1 kilogram or
more of a mixture and substance containing a detectable amount of heroin,
controlled substances, all in violation of Title 21, United States Code, Sections
841(a)(1) and 841(b)(1)(A).



COUNT 2

(Felon in Possession of a Firearm)

On or about August 29, 2019, in the State and District of Minnesota, the defendant,

ALONZO CARTER,
a/k/a "Alonzo Richardson,"

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

<u>Crime</u>	<u>Jurisdiction</u>	<u>Date of Conviction (On or about)</u>
Violation of No Contact Order	Hennepin County, MN	December 16, 2009
Escape from Custody	Hennepin County, MN	July 8, 2016

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, to wit, a Ruger 10/22 .22-caliber short-barreled rifle bearing serial number 12839778, and a Smith & Wesson 9MM-caliber handgun bearing serial number PWR4405, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 3

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about August 29, 2019, in the State and District of Minnesota, the defendant,

ALONZO CARTER,
a/k/a "Alonzo Richardson,"

did knowingly possess a firearm, that is, a Ruger 10/22 .22-caliber short-barreled rifle bearing serial number 12839778, and a Smith & Wesson 9MM-caliber handgun bearing serial number PWR4405, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, the violation charged in Count 1 of this Indictment, all in violation of Title 18, United States Code, Sections 924(c).

FORFEITURE ALLEGATIONS

The allegations in Counts 1-3 are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c).

Upon conviction of Count 1 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations, including but not limited to a Ruger 10/22 .22-caliber short-barreled rifle bearing serial number 12839778, and a Smith & Wesson 9MM-caliber handgun bearing serial number PWR4405, and any ammunition seized therewith.

Upon conviction of any of Counts 2 and 3 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) in conjunction with Title 28, United States Code, Section 2461(c), any firearm, accessories and ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g) or 924(c) including, but not limited to, a Ruger 10/22 .22-caliber short-barreled rifle bearing serial number 12839778, and a Smith & Wesson 9MM-caliber handgun bearing serial number PWR4405, and any ammunition seized therewith.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON